



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JMM:SK
F. #2013R00948

*610 Federal Plaza
Central Islip, New York 11722*

April 14, 2015

By Email & ECF

Richard D. Haley, Esq.
One Suffolk Square
1601 Veterans Memorial Highway
Suite 425
Islandia, NY 11749

Joseph Conway, Esq.
LaRusso & Conway
300 Old Country Road, Suite 341
Mineola, NY 11501

Re: United States v. Philip Kenner & Tommy C. Constantine
Criminal Docket No. 13-607 (JFB)

Dear Counsel:

Enclosed please find discovery provided by the government in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the discovery provided on January 16, 2014, January 23, 2014, February 10, 2014, March 6, 2014, March 11, 2014, March 24, 2014, April 11, 2014, May 21, 2014, June 6, 2014, August 6, 2014, August 15, 2014, August 20, 2014, August 22, 2014, August 27, 2014, August 28, 2014, August 29, 2014, September 2, 2014, September 11, 2014, September 12, 2014, September 19, 2014, October 2, 2014, February 20, 2015, February 25, 2015, February 28, 2015, March 3, 2015, March 5, 2015, March 17, 2015, April 6, 2015 and April 10, 2015.

Enclosed please find records obtained from Michael Shank Racing (MS 1), Racers Edge Motorsports (REM 1-11), Unitech Racing (UTEC 1-31), and a webpage related to Mosquito Rojo (MR 14). Enclosed please also find one additional text message and email sent by defendant Constantine to John Doe 10 (DS 864-867)

and two cover emails sent by defendant Kenner to John Doe 10 forwarding the text messages previously disclosed as KTXT 13-14 (DS 868-871).

Please contact me or AUSA James Miskiewicz if you have any questions or requests.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/Saritha Komatireddy
Saritha Komatireddy
James M. Miskiewicz
Assistant U.S. Attorneys
(631) 715-7825/7841

Enclosures

cc: Clerk of the Court (JFB) (by ECF) (without enclosures)